

**REMARKS**

Claims 1, 3-6, 8-11, 13-16 and 18-28 are pending in this application. Reconsideration and allowance of all the rejected claims are respectfully requested in view of the following remarks.

***CLAIM REJECTIONS UNDER 35 U.S.C. §103***

Claims 1, 6, 11, 16, 21, 23, 25 and 27 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shakib et al. (5,778,213) in view of Powell (6,150,905). Applicants respectfully traverse this rejection on the following basis.

Independent claims 1, 6, 11, and 16 recite, inter alia, creating a character table bank having at least one row representing an entry for a predetermined character and a plurality of columns associated with a corresponding row, wherein each column is associated with a predetermined character set and wherein the predetermined character sets represent different languages, among other things.

In an exemplary embodiment, the invention receives a textual message of unknown language and makes a normative decision concerning a character set that best matches the characters of the textual message, based on character sets associated with the columns of the character table bank (see the specification at page 6, second full paragraph and page 14, second full paragraph). A character set that contains a best match for the characters of the message is likely to be the native language of the original message (see the specification at page 3, fourth full paragraph).

The Examiner alleges that Shakib et al. discloses “creating a character table having one row representing an entry for a predetermined character and a plurality of columns associated with a corresponding row wherein each column is associated with a predetermined character set” (figure 1, his first table 17, comprising row and column, col. 1, line 59-65, col. 3, lines 18-28)” (see numbered paragraph 4 on page 3 of the December 2, 2003 Office Action).

While Shakib et al. discloses tables 17 and 24 having rows 12 and columns 14, Shakib et al. further discloses that the rows 12 represent *multiple records* of the database and the columns 14 represent *multiple fields* associated with the corresponding records (see Shakib et al., col. 3, lines 21-23). Specifically, Shakib et al. discloses a multilingual communication system having a first table 17 that stores, in a selected character set (e.g., a known language), the bulk of information found in the record and a second table 24 that stores, in a universal character set, the fields used to create sorted views or lists of records (see Shakib et al., col. 1, lines 59-65). Thus, there is no support for the Examiner’s position that Shakib et al. discloses creating a character table having one row representing an entry for a *predetermined character* and a plurality of columns associated with a corresponding row wherein each column is associated with a *predetermined character set*. Rather, Shakib et al. discloses that the rows represent *multiple records* of the database and the columns represent *multiple fields* associated with the corresponding records.

Furthermore, Shakib et al. discloses that all of the entries in the first table 17 correspond to the selected character set (e.g., one character set) and all of the entries in the second table 24 correspond to the universal character set (i.e., one character set) (see Shakib et al., col. 1, lines 59-65). The Examiner also correctly acknowledges that Shakib et al. “does not explicitly teach

wherein [sic] the predetermined character sets represent different languages” (see numbered paragraph 4 on page 3 of the December 2, 2003 Office Action).

The Examiner appears to rely on Powell for overcoming this deficiency in Shakib et al. In particular, the Examiner relies on Powell for disclosing “a facility for identifying the unknown 1 [sic] language of text represented by a series of data values in accordance with a character set [that] associates character glyphs with particular data values at the abstract and in figure 4 at col. 7, lines 7 to col. 10, lines 56” (see numbered paragraph 4 on page 3 of the December 2, 2003 Office Action). While Powell is directed to determining a character set and language of a document, Powell discloses first using an n-gram to identify the language of the document and, once the language is identified, using character set statistics for the identified language to determine the corresponding character set of the document (see Powell, col. 3, lines 20-33).

Based on the fact that Powell discloses character sets associated with a plurality of languages, the Examiner makes a determination that “one having ordinary skill in the art [in which] the invention was made would have found it obvious to incorporate into Shakib the mapping of different character set [sic] with a plurality of languages as taught by Powell because it would provide a system that would have a reasonable storage requirement and would be extensible to new character set and languages with significant utility” (see numbered paragraph 4 on page 4 of the December 2, 2003 Office Action).

Applicants respectfully submit that the Examiner’s motivation for combining Shakib et al. and Powell is tenuous, at best, and is not supported by either reference. First, the Examiner appears to rely on Shakib et al. solely for the fact that it discloses tables. Upon closer examination, Shakib et al. discloses a standard database having tables, wherein entries in the

tables store the information in a record. The claimed invention recites a character table bank having one row representing an entry for a *predetermined character* (not an entire record) and a plurality of columns associated with a corresponding row wherein each column is associated with a *predetermined character set* (not fields of the record). Thus, even if Shakib et al. and the claimed invention are directed to a table, Applicants respectfully submit that the structure of the claimed character table bank is distinguished from the structure of Shakib et al.'s table. Powell does not disclose tables.

Second, as discussed above, Shakib et al. discloses that the first table 17 stores the bulk of information found in the record, wherein a single character set represents the entire record. Shakib et al. discloses that storing the information for the first table 17 in a native character set (e.g., one character set) provides the advantage that the information may be stored on a server that supports only one language and also saves system resources by not having to convert from one character set to another character set unless the system is requested to do so (see Shakib et al., col. 2, lines 20-24). Since Shakib et al. explicitly states that the system benefits from maintaining the information in a *single* character set, there is no motivation for the Examiner's suggestion to modify Shakib et al. to include more than one character set associated with a plurality of languages. Furthermore, Applicants respectfully submit that following the Examiner's suggestion to modify Shakib et al. to include the features of Powell would render Shakib et al. inoperable and would further eliminate the benefits discussed above.

For at least the reasons set forth above, Applicants respectfully submit that none of the references cited by the Examiner, either alone or in combination, teach or suggest the features of

independent claims 1, 6, 11, and 16. Accordingly, Applicants further submit that claims 21, 23, 25 and 27 are allowable at least by virtue of their dependency.

Claims 3-5, 8-10, 13-15, 18-20, 22, 24, 26 and 28 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shakib et al. in view of Powell (6,150,905), as applied above, and further in view of Martino (5,548,507). Applicants respectfully traverse this rejection on the following basis.

Claims 3-5, 8-10, 13-15, 18-20, 22, 24, 26 and 28 depend from a corresponding one of independent claims 1, 6, 11, and 16 and therefore include the feature of creating a character table bank having at least one row representing an entry for a predetermined character and a plurality of columns associated with a corresponding row, wherein each column is associated with a predetermined character set and wherein the predetermined character sets represent different languages.

The above deficiencies of Shakib et al. and Powell are not overcome by Martino et al., which discloses a process that identifies the language or genre of a stored or transmitted document using a plurality of Word Frequency Tables (WFTs) (see the Abstract) and does not disclose creating a character table bank having at least one row representing an entry for a predetermined character and a plurality of columns associated with a corresponding row, wherein each column is associated with a predetermined character set and wherein the predetermined character sets represent different languages. In the November 5, 2002 Office Action, the Examiner further acknowledges that Martino et al. is deficient because it discloses that a message is evaluated by comparing *words* rather than comparing the *characters* of the message (see page 3 of the November 5, 2002 Office Action).

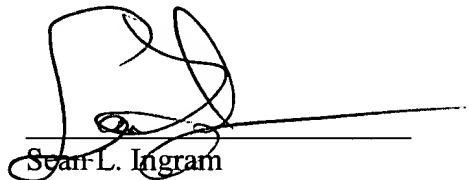
For at least the reasons set forth above, Applicants respectfully submit that none of the references cited by the Examiner, either alone or in combination, teach or suggest the features of independent claims 1, 6, 11, and 16. Accordingly, Applicants further submit that claims 3-5, 8-10, 13-15, 18-20, 22, 24, 26 and 28 are allowable at least by virtue of their dependency.

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,



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